

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SEATTLE SCHOOL DISTRICT NO. 1,

Plaintiff / Counterclaim  
Defendant,

v.

KURT BENSHOOF,

Defendant / Counterclaim  
Plaintiff,

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A.R.W. By and Through His Father, KURT  
BENSHOOF,

Counterclaim Plaintiff,

v.

NATHAN L. CLIBER,  
SARAH E. SPIERLING MACK,  
GREGORY C. NARVER,  
JESSICA R. OWEN,  
BLAIR M. RUSS,

Counterclaim Defendants.

NO. 2:23-cv-01829-JNW

COUNTERCLAIM DEFENDANT  
NATHAN CLIBER'S JOINDER OF  
COUNTERCLAIM DEFENDANTS MACK  
AND NARVER'S RESPONSE TO  
COUNTERCLAIM PLAINTIFFS'  
MOTIONS TO VACATE AND FOR *IN*  
CAMERA REVIEW

NOTE ON MOTION CALENDAR:

February 6, 2025

COUNTERCLAIM DEFENDANT CLIBER'S  
JOINDER OF COUNTERCLAIM  
DEFENDANTS MACK AND NARVER'S  
RESPONSE TO COUNTERCLAIM PLAINTIFF  
KURT BENSHOOF'S MOTIONS - 1  
2:23-cv-01829-JNW

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Comes now Counterclaim Defendant Nathan Cliber (“Counterclaim Defendant Cliber”) and files this Joinder of Counterclaim Defendants Mack and Narver’s Combined Response to Defendant Plaintiff Kurt Benshoof’s Motion to Vacate and Motion for *In Camera* Review (the “Response”), Dkt. 77, and states in support thereof as follows:

Counterclaim Defendant Cliber joins in Counterclaim Defendants Mack and Narver’s Response and incorporates the same as if fully stated herein. For the reasons stated in Defendants Mack and Narver’s Response, both the general arguments that apply to all of the counterclaim defendants in this action and the arguments specific to Counterclaim Defendant Mack, Counterclaim Defendant Cliber respectfully requests that this Court deny Defendant/Counterclaim Plaintiff Benshoof’s Motions to Vacate (Dkt. 75) and for *In Camera* Review (Dkt. 76).

The undersigned certifies that this memorandum contains 123 words, in compliance with the Local Civil Rules.

Dated: January 30, 2025

GORDON REES SCULLY MANSUKHANI,  
LLP

By: /s/ Sarah N. Turner  
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*Attorneys for Defendant Nathan Cliber*

**CERTIFICATE OF SERVICE**

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this day a true and accurate copy of the foregoing document was filed with the above-entitled Court through the United States District Court CM / ECF System and served as indicated:

Plaintiff / Counterclaim Defendant  
Seattle School District No. 1\

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Defendant / Counterclaim Plaintiff

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Date: January 30, 2025

*Jacqueline Burrell*  
Jacqueline Burrell, Legal Assistant

COUNTERCLAIM DEFENDANT CLIBER'S  
JOINDER OF COUNTERCLAIM  
DEFENDANTS MACK AND NARVER'S  
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KURT BENSHOOF'S MOTIONS - 3  
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